

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Case #13-24768-GLT

ROBERT S. ARENTH ,

Chapter 13

Debtor

PEOPLES NATURAL GAS COMPANY, LLC,

Movant

Related Doc: 108

v.

ROBERT S. ARENTH, and
RONDA J. WINNECOUR, Chapter 13 Trustee,

Respondent(s)

RESPONSE TO MOTION TO APPLY REFUND

AND NOW comes the Debtor, Robert S. Arenth, by and through his counsel, Christian M. Rieger, Esquire, and replies to the Movant's request to apply refund, and respectfully responds as follows:

1. Debtor acknowledges that the matter before the PUC is delayed pending decision from this Court.

2. Because November 2018 is the sixtieth month in the Plan, Debtor cannot consent to the commercial account budget of \$105.00 per month being added to the Plan as outlined in the proposed Order due to practical issues dealing with administration of the final months of the case.

3. In an effort to better effectuate closing of this case, however, and to substantially bring the case more current, Debtor consents to, both as outlined in Movant's proposed Order:

a. Application of \$928.34 (or the current delinquency of the commercial account as of the Hearing date) from the residential account to the commercial account; AND

b. Application of the remaining credit of the residential account being paid to the Chapter 13 Trustee, to be credited towards Debtor's plan base calculation.

WHEREFORE, Debtor respectfully requests this Honorable Court grant the requested relief.

Respectfully submitted,

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